

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

VIVIAN HANDY,

Plaintiff,

v.

**ALABAMA DEPARTMENT OF
REHABILITATION SERVICES, et al.**

Defendant.

*
*
*
*
*
*
*
*
*

Civil Action No.: 07-CV-376-MHT

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE
PLAINTIFF'S AMENDED COMPLAINT**

COMES NOW the plaintiff, Vivian Handy, and moves this Honorable Court to extend the plaintiff's deadline to file an amended complaint or other response to the defendants' motion to dismiss. In support of this motion, the parties state as follows:

1. The Court's Order dated August 29, 2007, set the deadline for plaintiff to file an amended complaint or other response to the defendants' motion for September 12, 2007.
2. Counsel for all parties have discussed the particularized circumstances surrounding this action and have agreed that an extension of time is warranted.
3. Counsel for the defendants do not oppose and have consented to this motion.

Wherefore, premises considered, plaintiff respectfully requests that the above deadline in this case be moved to September 26, 2007.

Respectfully submitted,

s/ Russell W. Adams
Russell W. Adams
Attorney for the Plaintiff

OF COUNSEL:

WIGGINS, CHILDS, QUINN & PANTAZIS, L.L.C.
The Kress Building
301 19th Street North
Birmingham, Alabama 35203
(205) 314-0500

CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of August, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Alice Ann Byrne
State Personnel Department
64 North Union Street
316 Folsom Administrative Bldg.
Montgomery, AL 36130

Stephen K. Simpson
Department of Rehabilitation Services
Legal Office
2129 East South Boulevard
Montgomery, AL 36116

s/ Russell W. Adams
OF COUNSEL